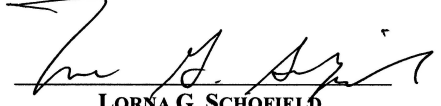


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ATTORNEYS FOR WELLS FARGO EQUIPMENT FINANCE, INC.

Application DENIED. The initial pre-trial conference shall proceed as scheduled. The parties shall submit their pre-conference materials by March 6, 2024.

Dated: March 5, 2024
New York, New York

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

----- x
WELLS FARGO EQUIPMENT FINANCE, INC.,

Index No: 1:24-cv-00422-LGS

Plaintiff,

against

JOSEPH COHEN AND EDWARD COHEN,

Defendants
----- x

**LETTER MOTION
FOR
ADJOURNMENT OF
THE CURRENTLY
SCHEDULED
INITIAL RULE 16
CONFERENCE ON
MARCH 13, 2024**

The Plaintiff, Wells Fargo Equipment Finance, Inc. and the Defendants, Joseph Cohen and Edward Cohen, by and through their counsel, Harlan M. Lazarus, copied herein, respectfully request that the March 13, 2024 Initial Conference (and the accompanying Joint Letter requirements presently due March 6, 2024) be continued until May 8, 2024 or to whatever subsequent May date that is convenient for the Court. As grounds therefore, the Parties state that the Defendants' original Answer date was set by the Court in conjunction with the Defendants' agreement to accept service of process for April 8, 2024, and that the Parties are in the process of attempting to amicably resolve the litigation.

There have been no prior requests for an adjournment of the initial conference or otherwise. In the interests of judicial time and resources, and the legal fees associated with such an exercise, the Plaintiff respectfully requests that the Initial Conference be continued accordingly.

WELLS FARGO EQUIPMENT
FINANCE, INC.

By Their Attorneys,
RIEMER & BRAUNSTEIN LLP

Dated: March 4, 2024

/s/Joseph R. Valle, Jr.
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CERTIFICATE OF SERVICE

I, Joseph R. Valle, Jr. hereby certify that on this 4th day of March 2024, I served the foregoing by causing a copy of same to be delivered by a true copy thereof, by e-mail and first-class mail.

Harlan M. Lazarus, Esquire
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hlazarus@lazarusandlazarus.com

/s/Joseph R. Valle, Jr.
Joseph R. Valle, Jr.

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